

REMARKS

Claims 1-2, 7-12, 14-15 and 20 are pending in this application. By this Amendment, claims 1, 7, 8, 14 and 15 are amended, claims 3-6, 13 and 17-19 are canceled and new claim 20 is added. No new matter is added. Specifically, claims 1 and 15 are amended to recite the limitations of claims 3-6. Claim 13 is canceled in favor of new independent claim 20, which is based on claims 1 and 10-13. Support for the amendments to the claims can be found in the specification and original claims.

Entry of the amendments is proper under 37 CFR §1.116 since the amendments:

(a) place the application in condition for allowance (for the reasons discussed herein); (b) do not raise any new issue requiring further search and/or consideration (as the amendments merely incorporate allowable subject matter into the claims); (c) do not present any additional claims without canceling a corresponding number of finally rejected claims; and (d) place the application in better form for appeal, should an appeal be necessary. The amendments are necessary and were not earlier presented because they are made in response to arguments raised in the final rejection. Entry of the amendments is thus respectfully requested.

I. **Allowable Subject Matter**

Applicant thanks the Examiner for the indication that claims 6-8 and 13-14 contain allowable subject matter if rewritten in independent form. As such, the amendments to the claims reflect this suggestion by the Examiner.

II. **Rejection Under 35 U.S.C. §102(b)**

Claims 15, 17-19 were rejected under 35 U.S.C. § 102(b) as allegedly being anticipated by U.S. Patent No. 6,068,372 (hereinafter Rousseau). The rejection is respectfully traversed.

The Patent Office asserts that Rousseau discloses the apparatus of claim 15, citing column 10, lines 29-42 of Rousseau. Applicant disagrees.

However, to expedite resolution of this matter, Applicant has amended claim 15. Claim 15 recites a drum maintenance unit including a positioning mechanism that properly positions the drum maintenance unit to a media device and provides electrical contact with the media device when the drum maintenance unit is installed in the media device, wherein the positioning mechanism provides a signal to the media device when the drum maintenance unit is properly installed in the media device. Claim 15 also includes a latching mechanism that releasably secures the drum maintenance unit to a media device and provides electrical contact with the media device when the drum maintenance unit is installed in the media device, a sensing mechanism comprising a data device in electrical contact with the latching mechanism, wherein the latching mechanism further provides a data connection point between the data device and the media device when the drum maintenance unit is installed in the media device, and a protective layer provided between the data connection point of the data device and the media device when the drum maintenance unit is installed in the media device.

Rousseau does not teach a drum maintenance unit, but rather teaches a removable cartridge with a life status assembly. The life status assembly is provided on the cartridge to determine when the useful life of the cartridge has been exhausted (see col. 10, lines 29-42). Rousseau further describes a circuit board which is electrically connected to the printer when the cassette is fully inserted in the printer and includes an internal counter that is decremented as prints are made (see col. 10, lines 29-32). Therefore, Rousseau merely provides for a life status assembly that involves a counter in which a message is generated when the counter reaches a predetermined value indicating when the cartridge needs to be replaced.

Thus, Rousseau does not disclose a drum maintenance unit, let alone a drum maintenance unit with a positioning mechanism which signals when a unit is properly installed to the media device.

However, the Patent Office continues to assert that Rousseau discloses a positioning mechanism. Even if so, Rousseau does not teach a drum maintenance unit with a protective layer provided between a data connection point of the data device and the media device of a latching mechanism. The Patent Office has indicated that such a protective layer (as in original claim 6) is not taught by Rousseau.

Therefore, nothing in Rousseau teaches the drum maintenance unit of amended claim 15.

The Patent Office asserts that Rousseau teaches the method of claim 17, citing col. 10, lines 29-42. Applicant disagrees.

However, to expedite resolution of this matter, Applicant has canceled claims 17-19.

For the foregoing reasons, Applicant submits that Rousseau does not teach or suggest amended claim 15. Reconsideration and withdrawal of this rejection are respectfully requested.

III. Rejection Under 35 U.S.C. §103(a)

Claims 1-5 and 9-12 were rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over U.S. Patent No. 5,808,645 (hereinafter Reeves) in view of U.S. Patent No. 6,428,225 (hereinafter Nguyen). This rejection is respectfully traversed.

The Patent Office asserts that Reeves discloses all the limitations of the drum maintenance unit of claims 1-5 and 9-12, except for the latching mechanism and recess formed in a portion of one of the drum maintenance unit and a media device and a corresponding member on the other of the drum maintenance unit and the media device, the

corresponding member being adapted to engage the recess when the drum maintenance unit is installed in a media device. Thus, the Patent Office relied on Nguyen as allegedly teaching the latching mechanism and a recess formed in a portion of one of the drum maintenance unit and a media device and a corresponding member on the other of the drum maintenance unit and the media device. Applicant disagrees.

However, to expedite resolution of this matter, Applicant amended claim 1. Claim 1 recites a drum maintenance unit including a latching mechanism that releasably secures the drum maintenance unit to a media device and provides electrical contact with the media device when the drum maintenance unit is installed in the media device. Claim 1 also includes a sensing mechanism comprising a data device in electrical contact with the latching mechanism, wherein the latching mechanism further provides a data connection point between the data device and the media device when the drum maintenance unit is installed in the media device and a protective layer provided between the data connection point of the data device and the media device when the drum maintenance unit is installed in the media device.

Claim 1 recites the limitations of original claim 6 by reciting a protective layer provided between the data connection point of the data device and the media device when the drum maintenance unit is installed in the media device. As stated by the Patent Office, the protective layer is not anticipated or taught by the references.

Thus, claim 1 recites the allowable subject matter of original claim 6 as suggested by the Patent Office. Further, claim 13 has been canceled in favor of new claim 20 and thus recites the allowable subject matter indicated by the Examiner.

Furthermore, Reeves teaches a transfer drum maintenance system such as a replaceable cartridge that applies an intermediate transfer layer, in the form of a liquid layer,

onto the transfer drum support surface, removes any untransferred ink or other debris from the support surface, and collects waste or purged ink in a removable and replaceable or reusable receptacle. See Reeves, column 2, lines 40-53. Nowhere does Reeves teach or suggest the drum maintenance unit of claim 1.

Even if Reeves were to have been combined with Nguyen as alleged by the Patent Office, the presently claimed subject matter still would not have been achieved because Nguyen does not remedy the deficiencies of Reeves.

For the foregoing reasons, Applicant respectfully submits that as amended, claims 1 and 20, and claims dependent therefrom, are patentable over the cited art.

Reconsideration and withdrawal of this rejection are respectfully requested.

IV. Conclusion

In view of the foregoing, it is respectfully submitted that this application is in condition for allowance. Favorable reconsideration and prompt allowance of claims 1-2, 7-12, 14-15 and 20 are earnestly solicited.

Should the Examiner believe that anything further would be desirable in order to place this application in even better condition for allowance, the Examiner is invited to contact the undersigned at the telephone number set forth below.

Respectfully submitted,



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